



March 16, 2010

CT General Assembly
Public Health Committee
Room 3000
Legislative Office Building
Hartford, CT 06106

Re: HB5477: An Act Concerning Clean Water and Stream Flow Regulations

Please accept this correspondence in support of HB5477, which is aimed at addressing fundamental concerns with the state Department of Environmental Protection's proposed stream flow regulations.

Norwich Public Utilities (NPU) is a municipally owned utility with over a century of first-rate service delivering water at affordable prices to the citizens of Norwich, as well as the surrounding towns of Lebanon, Franklin, Bozrah, Preston, Lisbon, Montville and the Mohegan Tribal Nation.

HB-5477 requires DEP to conduct basin screening and classify the watershed basins to determine whether there are streams and rivers with low flow concerns and establish priorities for addressing those concerns. It also ensures that the state Department of Public Health, which has regulation over public water supplies, retains its authority to ensure that water companies maintain adequate public water supplies to meet the public health, safety, economic development and agricultural needs of the state. In addition, the bill calls for a thorough examination of the compliance costs relative to implementation of proposed stream flow regulations.

NPU supports the goals of the stream flow regulations, but the manner in which the regulations are currently written/drafted are flawed and will have dramatic adverse consequences for NPU's consumers. NPU will see a 25% decrease in the safe yield of our water supplies, resulting in a water deficit during hot summer dry periods, something we have never experienced before. If NPU were to comply with the regulations as written, additional studies and analysis of the statewide stream flow impacts will result in the need to modify dams and infrastructure to provide the proposed volume of water flow release as required. These modifications will impose unwarranted new costs on the residents of Norwich and to the residents of the previously noted towns NPU serves NPU will also be forced to search for new sources of water supply which will increase the rates of our customers.

The proposed changes also effect business development in the towns we serve. The reduced availability of water may require towns to impose moratoriums on new water service connections, halting economic development and construction in those areas. Other areas will struggle with recurring water use restrictions that can be disruptive for both residents and businesses that depend on reliable public water supplies in their day-to-day operations.

HB-5477 addresses these issues by: 1) Requiring DEP to analyze and classify the watershed basins; 2) Protecting water supplies needed for public health, safety, agriculture and economic development; and 3) Thoroughly analyzing compliance costs before moving forward with regulations. For these reasons, NPU urges your support of HB5477.

Thank you for your time and consideration, and I look forward to continuing our common interest in the support of a safe and clean environment. If I can be of any assistance please feel free to contact me at 860-823-4192 or by email at johnbilda@npumail.com.

Sincerely,



John Bilda
General Manager
Norwich Public Utilities